

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Amir Jacorion Brown,

Case: 4:21-mj-30333

Judge: Unassigned,

Filed: 07-06-2021 At 03:46 PM

CMP US V BROWN (kcm)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 5, 2021 in the county of Genesee in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in possession of a firearm
18 U.S.C. § 922(n)	Receiving a firearm while under indictment

This criminal complaint is based on these facts:

I have probable cause to believe that on July 5, 2021, in the Eastern District of Michigan, Amir Brown, knowing that he had been convicted of a felony offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm in violation of 18 U.S.C. § 922(g)(1). I also have probable cause that on July 3, 2021, in the Eastern District of Michigan, Amir Brown received a firearm while under indictment in violation of 18 U.S.C. § 922(n).

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: July 6, 2021

City and state: Flint, MI



Complainant's signature

Dustin Hurt, Special Agent, ATF

Printed name and title



Judge's signature

Curtis Ivy, Jr., United States Magistrate Judge

Printed name and title

AFFIDAVIT

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since October of 2018. I am currently assigned to the Detroit Field Division, Flint Field Office. Before working for the ATF, I was employed by the Michigan Department of State Police (MSP) for approximately seven years. Before working for MSP, I was a local police officer for the Grand Ledge Police Department for approximately three years. I held numerous positions with the MSP, including Detective Sergeant in the Polygraph Unit and Task Force Officer with the FBI. During my employment with ATF and MSP, I have conducted or participated in numerous criminal investigations focused on firearms, armed drug trafficking, and criminal street gangs, and other violations of federal law.

2. I make this affidavit from personal knowledge based on my participation in this investigation, my review of reports and other materials prepared by those who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. On July 5, 2021, at approximately 12:30 pm, Metro Police Authority Officer Fisher conducted a traffic stop near Gateway Center Blvd and Hill Rd in Genesee County, Mundy Township, MI for multiple traffic infractions. The vehicle did not have a license plate and both the windshield and rear window were badly shattered.

4. Officer Fisher made contact with the driver and lone occupant of the vehicle identified as Amir Jacorion Brown (b/m XX/XX/2001). Brown was identified by his Michigan Identification Card, but he did not have a driver's license. Officer Fisher asked Brown to exit the vehicle and Brown complied. Officer Fisher put Brown in handcuffs for operating without a license and operating an unregistered vehicle.

5. Officer Fisher searched Brown's person. Officer Fisher patted Brown's front left pants pocket and felt an object concealed in Brown's groin area which Officer Fisher believed to be the grip of a pistol. Officer Fisher asked Brown if he was in possession of a pistol of which Brown admitted he was. The Smith & Wesson M&P 45 semi-automatic pistol bearing S/N: HUK6609 was retrieved from Brown's pants. The pistol contained 13 rounds of ammunition with 12 inside the magazine and an additional round chambered. Brown was placed in Officer Fisher's patrol vehicle after the firearm was retrieved. No other contraband was located on Brown's

person or inside of his vehicle. Officer Fisher queried the pistol in the Law Enforcement Information Network (LEIN) which stated that the pistol was not registered.

6. Officer Fisher transported Brown to the MPA Police Department where he conducted an interview after reading him his Miranda Rights. Brown said that he lives at his mother's house in Flint and he was recently shot at. Brown believed he was being targeted. Brown explained to Officer Fisher that he recently purchased the firearm from an unknown individual at the Marathon Gas Station on Clio Rd in Flint on July 3, 2021. Brown admitted he purchased the firearm for \$300 to protect himself and the magazine and ammunition were included in the purchase. Brown further stated that the firearm was in the center console of the vehicle when Officer Fisher initiated the traffic stop. Brown advised that he moved the pistol from the center console to inside his pants because he knew he did not have proper registration and knew the vehicle would be searched.

7. I reviewed Brown's criminal history and court records. On October 31, 2017, Brown pleaded guilty in Genesee County Circuit Court in Case Number 17-041311-FC to unarmed robbery and felony firearm. Brown was charged and pleaded guilty as an adult but was sentenced as a juvenile. Brown is pending a probation violation in that case. He also is pending felony charges and has been arraigned and

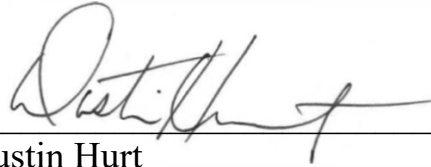
is on bond in the following Genesee County District Court cases:

- 19TA2381, offense date 9/29/19 (felon in possession of a firearm, felon in possession of ammunition, carrying a concealed weapon, misdemeanor assault, and two counts of felony firearm);
- 20TC1031, offense date 6/9/20 (assault with intent to murder, discharge of a firearm at police, felon in possession of a firearm, and three counts of felony firearm second offense); and,
- 20TA1381, offense date 7/27/20 (felon in possession of a firearm, felony firearm second offense).

8. I have spoken with ATF Special Agent Jonathan Wickwire, who is recognized by ATF as having expertise in the interstate travel and manufacture of firearms. SA Wickwire advised that the 45 caliber Smith & Wesson model: M&P45 bearing S/N: HUK6609 was manufactured outside of the state of Michigan and are firearms as defined in Chapter 44, Title 18, United States Code.

9. Based on the foregoing, I have probable cause to believe that on July 5, 2021, in the Eastern District of Michigan, Amir Brown, knowing that he had been convicted of a felony offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm in violation of 18 U.S.C. § 922(g)(1). I also have probable cause that on July 3, 2021, in the Eastern

District of Michigan, Amir Brown received a firearm while under indictment in violation of 18 U.S.C. § 922(n).



Dustin Hurt
Special Agent
Bureau of Alcohol, Tobacco, Firearms & Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means on this 6th day of July, 2021.



Hon. Curtis Ivy, Jr.
United States Magistrate Judge